

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JESSE HAMMONS,

Plaintiff,

v.

UNIVERSITY OF MARYLAND MEDICAL SYSTEM
CORPORATION, et al.

Defendants.

Case No. 1:20-cv-02088-DKC

INITIAL JOINT STATUS REPORT

Pursuant to the Court’s October 25, 2021, Scheduling Order (ECF No. 65), Plaintiff Jesse Hammons and Defendants University of Maryland Medical System Corporation, UMSJ Health System, LLC, and University of Maryland St. Joseph Medical Center, LLC (collectively, “Defendants”), hereby submit their initial joint status report in the above-captioned case.

1. Requests for Modification

At this time, neither party requests a modification to any specific deadline or other provision of the Scheduling Order, except as provided below in Section 4.

2. Consent to Proceed Before a United States Magistrate Judge

The parties do not consent to proceed before a United States Magistrate Judge at this time.

3. Mediation with a United States Magistrate Judge

The parties are willing to consider mediation before a United States Magistrate Judge or possibly a private mediator, but they do not believe that the Court should order mediation at this time. If at any point during the litigation the parties believe that mediation would be beneficial, they will notify the Court.

4. Report on the Scope of Discovery and Electronically Stored Information

Plaintiff believes that the depositions he takes in this case may exceed the 25-hour limit referenced in the Court's Initial Scheduling Order (Dkt. 65). The parties therefore instead agree to abide by the limitations on depositions set forth under Rule 30 of the Federal Rules of Civil Procedure. The parties further agree that any additional depositions beyond those permitted by Rule 30 will require either a stipulation between the parties or a court order.

Additionally, the parties agree that discovery requests may be served electronically and that discovery responses will be served electronically by the date that the responses are due. To the extent any discovery involves electronically stored information ("ESI"), the parties agree to meet and confer on the proper scope of such discovery, including the use of custodians and search terms. Finally, the parties agree to meet and confer on any discovery disputes that may arise and to make every effort to resolve any such dispute without involving the Court, whenever possible.

Dated: November 8, 2021

/s/ Denise Giraudo

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CERTIFICATE OF SERVICE

I hereby certify that on November 8, 2021, Defendants' counsel was served with the foregoing document through the Court's Electronic Case Filing System.

/s/ Louis J. Ebert
Louis J. Ebert